

**Clark County Comprehensive Plan
Determination of Significance and
Request for Comments
on Scope of EIS**

Description of Proposal

Clark County is in the process of revising its 2007 Comprehensive Growth Management Plan as required by the Growth Management Act (GMA), RCW 36.70A. The environmental impact review process under the State Environmental Policy Act (SEPA) will be used to inform the public of the choices between the proposed alternatives.

This notice announces the County's intent to prepare a supplemental environmental impact statement (SEIS) on the proposed update to the Clark County Comprehensive Growth Management Plan. Because of the lack of growth in the county since the 2007 Plan was adopted, the county will rely on the FEIS done for the 2007 Plan and supplement it with environmental analysis, as needed.

The 2007 Plan FEIS covered all of unincorporated Clark County within a "maximum study area" (MSA). The 2007 Comprehensive Plan urban growth areas (UGAs) were established within the MSA. Court challenges to de-designated agricultural land resulted in further shrinking of UGAs.

The SEPA process requires that the County, as lead agency, notify the public of its intent to prepare an SEIS so that citizens have an opportunity to comment on the scope of the impacts to be examined in the SEIS. This notice discusses recent comprehensive plan-related decisions made by Clark County and describes the alternatives and scope of impacts analysis to be considered in the SEIS.

Proponent

Clark County is the proponent for the comprehensive plan update and is preparing this document pursuant to WAC 197-11-360.

Location of proposal

The location of the proposal is Clark County, Washington.

Lead agency

Clark County Community Planning is the lead agency.

The lead agency has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030 (2)(c) and will be prepared. However, because growth has not occurred anywhere near that predicted in 2007, the county will prepare a supplemental EIS pursuant to WAC 197-11-620 and will re-adopt the 2007 EIS pursuant to WAC 197-11-965.

Context for Comprehensive Planning

The county's comprehensive plan must address state growth management goals and be consistent with the County-wide Planning Policies, as well as meet the requirements of the GMA. Since the County plan was adopted in 2007, conditions in the county as well as state and federal laws may have changed, requiring corresponding changes to the County's Comprehensive Plan. In addition, more accurate mapping and field determination of available buildable land has recently been accomplished, which may change the conclusions of the previous plan regarding the ability of the current urban growth areas to accommodate future population and jobs.

Recent Direction

The Board of Clark County Commissioners (Board) has picked a population forecast and a jobs forecast, and re-affirmed planning assumptions. The Board has also decided on an allocation strategy for population and jobs. The county will assume an average annual population growth rate of 1.12% to the year 2035, the planning horizon of the comprehensive plan. The planning assumptions and policy direction can be found at http://www.clark.wa.gov/planning/comp_plan/index.html.

The outcome of this SEIS and comprehensive planning process could be adjustments to zoning districts located both in UGAs and in rural areas. It is expected that urban growth boundaries will remain the same. The plan does not in itself entail construction or other physical actions. As a result, the analysis and description of the plans' impacts are not detailed to specific sites, but instead give an overview of the impacts that could be expected under the various alternatives.

The SEIS will present information about the relative impacts of the alternatives described below. SEPA rules acknowledge that less detailed information is available on the impacts associated with the adoption of a comprehensive plan and allows the discussion of alternatives at a level of detail appropriate to the scope of the proposal. SEPA also permits the adoption of other documents where appropriate as part of disclosing existing conditions and anticipated impacts. For that reason, the SEIS will adopt portions of the 2007 FEIS and refer to elements of the environment that are unlikely to be affected by the changes proposed now.

SEPA encourages discussion of alternatives as different means to accomplish a stated objective. In this case, the level of detail will generally be focused on the current urban growth areas, and each of the alternatives will describe a concept for organizing, distributing, and serving growth across the area. The alternatives will be considered in light of their ability to accomplish the objectives of the GMA and the objectives of the Comprehensive Plan and County-wide Planning Policies. The alternatives will be evaluated against the planning assumptions and the values and principles attached to this notice.

The lead agency has identified the following areas for discussion in the EIS:

1. Alternatives

Three possible alternatives for the SEIS have been discussed:

The No Action Alternative (Alternative 1) is the current urban growth areas (those adopted in the September 2007 Comprehensive Plan and subsequently modified in response to court challenges), with adopted urban growth boundaries, planning assumptions, policies, and implementing ordinances.

Alternative 2 will include Alternative 1 and possible zoning changes within UGAs, as well as changes to rural lands: AG-20 to AG-10, FR-40 to FR-80, and R-20 to R-10, where needed; and the surface mining overlay.

Alternative 3 will include Alternative 1 as well as any city-initiated changes to their UGAs.

A preferred alternative will be developed based on technical analysis, input from cities and the results of scoping and the environmental analysis. The preferred alternative is expected to keep the current urban growth areas, change the zoning on parcels in UGAs that may be more suitable for employment, and possibly reduce the minimum parcel sizes for resource lands. The only anticipated changes to 2007 comprehensive plan policies and the implementing ordinances would be those required to be consistent with the preferred alternative. Where it is expected that changes will be needed, the SEIS will disclose the policies that would be changed.

2. Elements of the Environment

Below is a list of the elements of the environment defined by SEPA and proposed for evaluation in this SEIS. By adopting portions of the 2007 FEIS, the county will be able to use much of the data and analysis prepared for the September 2007 adopted plan as a starting point for additional data-gathering and analysis. Interested parties are invited to comment on the elements commonly included in a SEPA review as well as other issues of concern. A list of issues is attached.

- 1) Natural Environment
 - a) Earth
 - i) Soils
 - b) Water
 - i) Surface waters
 - ii) Groundwater and aquifer recharge areas
 - c) Fish and Wildlife Habitat
 - i) Habitat
 - ii) Sensitive, Threatened and Endangered Species
 - iii) Migratory species and migration routes
 - iv) Wetlands
 - d) Energy and Natural Resources
 - i) Renewable and non-renewable energy sources
 - ii) Scenic resources
- 2) Built Environment
 - a) Land and Shoreline Use
 - i) Land use, population, and housing
 - ii) Economy
 - iii) Historic and cultural resources
 - b) Transportation
 - i) Roadway Network (including Freight)
 - ii) Transit
 - iii) Non-motorized modes
 - c) Public Services and Utilities
 - i) Fire
 - ii) Police
 - iii) Schools
 - iv) Parks or other recreational facilities
 - v) Libraries
 - vi) General government facilities
 - vii) Solid waste
 - viii) Sanitary Sewer
 - ix) Public water supplies
 - d) GMA Conformance
 - i) GMA Requirements
 - ii) County-wide Planning Policies
 - iii) Concurrency
 - iv) Fiscal Impacts
 - v) Public Involvement

Below is a general description of the way the SEIS will cover each of the elements of the environment noted above.

A. Natural Environment

1. **Earth: Soils:** Impacts to soils would depend on where the alternatives direct new development. For instance, soil-related impacts could result if centers or villages were located in areas that have steep slopes, unstable soils or are subject to liquefaction. To the extent the alternatives give different levels of protection to open space or other natural areas, they could have impacts on these unique physical features.
2. **Water: Surface waters, Groundwater and Aquifer Recharge Areas:** Depending on the locations of proposed centers for residential development and the level of development intensity they would be expected to absorb, some of the alternatives could allow higher amounts of impervious surfaces (e.g., from new buildings and their associated parking, or roadways). In general, covering land with impervious surfaces increases the amount of water that runs off the land and is not absorbed during a storm. Increased runoff could have impacts on the storm and sanitary sewer systems, affect stream flows, and contribute to localized flooding. Those impacts may be mitigated by existing requirements for on-site storm water detention; in areas that are redeveloped to higher concentrations flooding potential may actually be reduced, if storm water improvements are conditions of approval.
The SEIS will generally describe the water quality impacts that could be caused by increased vehicle use of streets, since roadway runoff contains a variety of vehicle-related pollutants that could be carried to streams and lakes.
A higher population in the county will increase the demand on the regional public water supply. The SEIS will explore the relative impacts on the regional water supply that could be caused by the growth levels specified in the alternatives. Water conservation and other resource development are the primary mitigations for impacts on water supply.
3. **Fish and Wildlife Habitat:** Increasing urbanization in the county could reduce habitat, as well as the numbers and diversity of plants and animals. Steelhead salmon species listed as threatened under the ESA inhabit major rivers and streams in the county. Urbanization in the watersheds can affect those species. Wetlands provide many functions, such as managing stormwater runoff (as discussed in #2), and one of their important functions is providing wildlife and plant habitats. The significance of the impacts will depend on the location and size of the proposed UGA expansions and proposed policies to protect critical areas and enhance water quality. The preferred alternative ultimately chosen would be required by federal law to protect threatened and endangered species. In addition, state regulations require the designation and protection of critical areas using the "best available science".
4. **Energy and Natural Resources:** Different land use patterns and transportation options in the various alternatives will affect the total vehicle miles traveled and therefore the amount of fuel used for commuting and other travel. The residential densities implied by the various alternatives may offer different opportunities for efficient use of fuel for heating, commuting, and other travel.

B. Built Environment

1. **Land and Shoreline Use:** Land use, Housing, the Economy, and Cultural Resources. The SEIS will analyze the alternatives' compliance with GMA and the Shoreline Management Act, and consistency with County-wide Planning Policies. It will examine the impacts related to allocating future growth to areas currently used for other purposes. Consistency with GMA requirements for rural lands relative to urban growth boundaries would also be evaluated.
The SEIS will discuss the impacts caused by changes to the comprehensive plan and zoning maps, including the effects on development capacity – the theoretical number of housing units and jobs allowed by the zoning. The SEIS will describe the number and type of jobs and housing units that could be available under the different alternatives, and how these patterns meet County housing and economic development goals. The

alternatives do not require certain buildings on specific sites, but would allow certain types of buildings in general areas. Therefore, in terms of potential impacts on the aesthetic character of the county, the SEIS cannot anticipate visual impacts of individual new buildings that would occur under particular alternatives. The SEIS will describe the overall visual effects that could be caused by the urban design components (such as transition zones and use of open space) of the land use concepts in the alternatives. The SEIS will also generally describe how the land use patterns proposed for the urban growth areas could change the appearance of those areas.

The alternatives could place varying levels of redevelopment pressure on historic and cultural resources, depending on the locations and intensity of development they allow. Once the locations for urban growth boundary expansions have been identified, the SEIS will examine the extent to which this constitutes a significant impact, using the County's map of areas having a high probability for cultural resources.

2. **Transportation:** The SEIS will use information derived from a traffic assignment model to describe the effects of the alternatives' proposed roadway and transit changes, reflecting the growth levels and distribution patterns on vehicular traffic and congestion. It will describe the county's ability to meet level-of-service standards given the proposed distribution of land uses under each alternative. The SEIS will also include information about the impacts of LOS standards for state facilities on the local street network.
3. **Public Services and Utilities:** The SEIS will describe the relative effects the different alternatives would have on each of the cities' and other providers' ability to ensure adequate services to meet the demand generated not only by the amount of residential and commercial growth, but also by the distribution of that growth. In particular, impacts on fire and police services, school and recreational facilities, sewer and solid waste will be considered.

The SEIS will also evaluate how well each alternative conforms to the policies and requirements of the Growth Management Act and the County-wide Planning Policies. It will also look at fiscal impacts from each alternative. Another requirement for an SEIS is to disclose unavoidable adverse impacts and irretrievable commitment of resources that could occur with adoption of one of the alternatives.

Scoping

Agencies, affected tribes, and members of the public are invited to comment on the scope of the SEIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required.

Comments should be provided in writing by September 1, 2014, to Oliver Orjiako.

Responsible official: Oliver Orjiako, Director, Community Planning Phone: 360-397-2280 (4112)

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Signature:



Oliver Orjiako, Director, Community Planning